

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LAW SCHOOL ADMISSION COUNCIL,  
INC.,

Plaintiff,

v.

MORLEY TATRO,  
d/b/a CAMBRIDGE LSAT

Defendant.

Civil Action No. 15:5219-MAK

**MOTION FOR EXTENSION OF TIME TO RESPOND TO  
DEFENDANT’S MOTION TO DISMISS**

Plaintiff Law School Admission Council, Inc. (“LSAC”) requests that the Court extend the deadline for LSAC to respond to the Motion to Dismiss filed by defendant Morley Tatro (“Defendant”) until December 14, 2015, or 11 days from the date on which Defendant fully responds to LSAC’s jurisdictional discovery requests, whichever is later. The reasons for this request are as follows:

1. On October 29, 2015, Defendant filed a Motion to Dismiss. *See* Dkt. No. 9.
2. On November 5, 2015, the Court ordered that (a) LSAC serve jurisdictional discovery upon Defendant by November 6, (b) Defendant “fully respond” to this discovery no later than November 23, 2015, and (c) LSAC submit its response to Defendant’s Motion to Dismiss on December 4, 2015 – 11 days after it received Defendant’s discovery responses. *See* Dkt. No. 13 ¶ 2(a), (b) & (c).
3. On November 6, LSAC complied with the Court’s Order and served upon Defendant jurisdictional-related Requests for Production, Interrogatories, and Requests for Admission.

4. On November 23, however, Defendant did not respond to LSAC's jurisdictional discovery. Instead, LSAC's counsel received an email on that date from Eric Menhart of the Lexero Law Firm informing LSAC that Defendant had retained Mr. Menhart as counsel, that Defendant would not be responding to LSAC's jurisdictional discovery by the Court-ordered deadline, and that defendant is not opposed to any extension that LSAC seeks as a result of defendant's actions.

5. LSAC's counsel promptly followed up with Mr. Menhart via voicemail and email. In response, Mr. Menhart has informed via e-mail that he "believe[s] he will have a response" to LSAC's discovery by December 2.

6. Defendant's failure to comply with the Court's Order impacts LSAC's ability to adequately respond to the Motion to Dismiss by the December 4 deadline. As such, so that LSAC can review the Court-ordered jurisdictional discovery in time to adequately prepare its Opposition to Defendant's Motion to Dismiss, LSAC requests that the Court extend the deadline for LSAC to file its Opposition to Defendant's Motion to Dismiss until the later of December 14, 2015 or 11 days from the date that Defendant provides responses to LSAC's jurisdictional discovery.<sup>1</sup>

7. Mr. Menhart has represented that he does not oppose this motion.

A proposed order is attached.

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<sup>1</sup> LSAC does not waive and expressly reserves all arguments regarding the untimeliness of Defendant's responses to LSAC's jurisdictional discovery requests and all consequences flowing therefrom.

Date: November 25, 2015

Respectfully submitted,

s/John V. Gorman

John V. Gorman (Pa. Bar I.D. No. 80631)

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*Attorneys for Plaintiff Law School Admission  
Council, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the date indicated below, I electronically filed and served the foregoing document via the Court's ECF system. A copy of the foregoing document is available for viewing and downloading on the Court's ECF System.

I also certify that I e-mailed the following persons:

Morley Tatro d/b/a Cambridge LSAT  
[rippinradio@yahoo.com](mailto:rippinradio@yahoo.com)

Eric Menhart  
p17p1680a345@Lexero.com

Date: November 25, 2015

s/John V. Gorman

John V. Gorman